## **REMARKS:**

The courtesies extended to the undersigned by Examiner Snelting and by SPE Saul Rodriguez during the course of the interview held April 13, 2010, are acknowledged and appreciated. As was discussed during the interview, Applicants, their principal representatives in Germany, and the undersigned have carefully reviewed the Final Office Action of January 15, 2010 in the subject U.S. patent application, together with the prior art cited and relied on in the rejection of the claims. In response, the claims of the application have again been amended to even more clearly patentably define the subject invention over the prior art cited and relied on. A Request for Continued Examination (RCE) is being filed concurrently herewith to provide the Examiner with sufficient time to consider the currently amended claims. Reexamination and reconsideration of the application and allowance of the claims is respectfully requested.

As discussed with Examiners Snelting and Rodriguez during the interview, as depicted in the drawings, described in the Substitute Specification, and recited in the currently pending claims, the subject invention is directed to a device for transporting reels of material. These reels of material are typically large reels of newsprint that will be used in the printing of a newspaper. As such, these reels of paper are heavy and are not easy to handle and to move. The less frequently these reels of material have to be manipulated, as they move from a reel preparation station to a reel changer of a reel-procuring machine, and as a printing unit, the more smoothly and efficiently the operation of the printing facility, in which these reels of material are utilized, will be.

As may be seen in Fig. 1 of the drawings, the reels 01 of material are initially held in a main storage area 02. These reels 01 in the main storage area are typically wrapped with a protective covering. They are moved to a reel receiving area or reel receiver 01, which is a smaller area that is typically intended to store only a limited number of the reels 01, such as a number that may be required for a day's production. Individual reels 01 are later taken from the reel receiver and are placed on primary transport carriages 27. Each such primary transport carriage 27 is configured to hold one reel of material 01.

Each such reel of material 01, on its primary transport carriage 27, is moved into a reel unpacking station 03. In the reel unpacking station or reel preparation station, each reel 01 is unpacked from its protective wrapper. It is also typically prepared to be used in flying web splice by having a suitable splice tape attached to its leading end. Since the splice tape has a finite life, the individual reels 01 can be prepared, in the reel preparation station, only a limited length of time before their intended use.

Once each of the reels 01 has been prepared in the reel preparation station, it is moved either directly to a reel changer 09 of a web-processing machine 06, or is moved to an intermediate storage area 11. As may be seen in the embodiment of Fig. 1, the intermediate change area 11 and the reel changer 09 of the web-processing machine 07 are linked by a transport route 12; 14. This transport route is a single, straight path that extends from the intermediate storage area 11 directly to the reel changer 09. Secondary transport carriage or carriages 32 travel along only this single, straight transport path 12; 14. Each secondary transport carriage 32 is structured, as may be

seen more clearly in Fig. 5, to receive one or more of the primary transport carriages 27 directly from the reel preparation station and to transport each primary transport carriage 27, and its supported reel 01 either to the reel changer 09 or to one of the plurality of reel storage spaces 13 that are provided in the intermediate storage area 11.

The intermediate storage area 11 is comprised of a plurality of these individual reel storage spaces 13. The majority of these spaces each have a storage space width, in a direction transverse to the longitudinal direction of web travel, which is twice the width of one reel of material. In other words, two reels of material, which have each been prepared in the reel preparation station, can be stored side-by-side in each of the reel storage spaces. The adjacent reel storage spaces are spaced apart from each other, in the longitudinal direction of web travel, such that a new reel of material can be placed in each web reel storage space. Each of these reel storage spaces in the intermediate reel storage area is adapted to receive the reel or reels of material, while they are still supported by their own ones of the primary transport carriages. To facilitate the movement of each such primary transport carriage in its respective one of the plurality of reel storage spaces, each such reel storage space is provided with a primary transport carriage drive arrangement.

In the Final Office Action of January 15, 2010, the Examiner approved and entered the changes to the specification and drawings that were submitted on October 30, 2009. Such action by the Examiner is appreciated.

Claims 144 and 146 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite. It was asserted that claims 144 and 146 recited "said reel storage

areas" but that claim 89, from which they depend, recited "a reel storage area". In response, claim 144 has been cancelled and claim 146 has been amended to recite "reel storage spaces", a term that is believed to find proper support in claim 89. Claim 146 is now believed to comply with 35 U.S.C. 112, second paragraph.

Claims 89, 91, 93, 95, 97, 99-101, 109, 110, 118-121, 123, 126, 129-135, 141, 143-146, and 148-156 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. patent No. 6,138,938 to Lehrieder in view of U.S. published application No. 2003/0164102 to Schaede. At pages 3 and 4 of the detailed Action, the Examiner set forth his interpretation of the teachings of the Lehrieder reference. As was discussed with Examiner Snelting and with SPE Rodriguez during the interview of April 13, 2010, the undersigned respectfully disagrees with certain aspects of the Examiner's characterization of the prior art Lehrieder document.

As was discussed during the interview, the reels of material which are being used in the claimed web-processing machine, are typically large rolls of material. They are heavy and cumbersome. The fewer times that each one reel of material has to be loaded onto a different cart, the better. In his discussion of the prior art Lehrieder reference, at points e) and f) of element 6, it is believed that the Examiner's characterizations of the prior art Lehrieder patent are incorrect and that they fail to appreciate one of the primary benefits of the subject in invention.

In the discussion of the Lehrieder prior art device, at point e), it is recited that Lehrieder shows a transport route, which is the route of the third transport cart 41. It is further asserted that this transport route extends <u>directly</u> (emphasis added) from the

intermediate reel change area to the reel changer. The undersigned respectfully disagrees.

The prior art Lehrieder device, which was invented by the inventor of the subject device, uses an assembly of four different transport carts or carriages 16, 27, 41, and 51 to get a reel of material from a reel preparation area to the reel changer. Such a complex system inevitably is slower, less reliable and more costly than the present invention. In the prior art Lehrieder device, as may be seen in Fig. 1, upright rolls of material are carried by a forklift truck 4 to a first area 7. They are then loaded onto a conveyor and are taken to an unpacking station 8. They are then rotated by 90° and are sent to one of two transfer stations 13 or 14. There, each reel is loaded onto a first transport cart 16. The first transport cart 16 is then loaded onto a second transport cart 27 that is equipped with a turntable 29. The second transport cart 29 carries the first cart 16, and its reel of material, to an intermediate storage facility 39. As may be seen in Fig. 1, that intermediate storage facility 39 is adjacent to the web-processing machine, which is provided with reel changers 2.

The reels of material are unloaded off the second transport cart 27 and are positioned in the intermediate storage facility 39. They are then moved out of the intermediate storage facility 39 and are placed onto a third transport cart 41. The third transport cart 41 runs along a third transport cart track, which is not specifically numbered. As may be seen in Fig. 1, the third transport cart 41 moves in a direction parallel to the longitudinal direction of web travel in the web-processing machine. However, that third cart track is situated between the intermediate storage area 39 and

the plurality of aligned web-processing stations in the web-processing machine.

After a reel of material, and its supporting first transfer carriage 16 has been removed from the intermediate storage area 29 and has been loaded onto the third transport carriage 41, it is moved to a point adjacent one of the web-processing stations. Each such web-processing station, as may be seen in Fig. 3, has a fourth transport cart or carriage, generally at 54. The full reel of material, on the first transport cart 16, is unloaded from the third transport cart 41 and is moved transversely to the longitudinal direction of web travel, across a track 48 and to a reel changer by the action of the fourth transport cart 54. Once this has been done, the fourth transport cart 54 then moves the reel of material into position so that it can be loaded onto the reel changer.

Returning to the Examiner's discussion of this Lehrieder reference, it is apparent that the transport route for the third transport cart 41 does not extend directly from the intermediate reel storage area 39 to the reel changer 2 of the web-processing machine. Instead, it extends along the length of the intermediate storage area 39 and also along the length of the plurality of web-processing stations that make up the web-processing machine. A reel of material, on its supported primary or first transport cart 16, is removed from the second cart 27 where it is placed into the intermediate storage facility 39. It is loaded onto a third transfer cart 41, when it is removed from the intermediate storage area 39. It is then carried to a point adjacent one of the web-processing machines where it is transferred from the third cart 41 to a fourth cart 54. The fourth cart 54 delivers the reel of material to the reel changer.

In point f) of element 6, at the bottom of page 3 of the detailed Action, the Examiner recited that the Lehrieder reference shows at least one secondary transport carriage (27, 41). In fact, as noted above, cart 27 is a second cart while cart 41 is a third cart. Part f) further recites that the secondary transport carriage, i.e., carriage 27, is used to receive one of the reels in the reel preparation station (26) and to transport the reel and its primary cart 16, directly to the intermediate storage area (39) "...along said transport route...". This transport route that is traveled by the second transport cart 27 is not the same transport route that is traveled by the third transport cart 41. As is seen in Fig. 1, these two transport routes are parallel to each other but are situated on either side of the intermediate storage facility 39. They are two separate, different transport routes. They are traveled by two distinct, different transport carriages 27 and 41. The first transport route is used to deliver prepared reels to the intermediate storage area 39. The second transport route is used to take reels from the intermediate storage area 39 and to transport them to various locations adjacent different ones of the web-processing stations in the web-processing machine, each of which webprocessing stations is equipped with its own reel changer 2. As discussed during the interview, the subject invention, as recited in currently pending independent claim 89, is an improvement over the prior art Lehrieder device because it simplifies the overall process and substantially reduces the number of transfers that are require to get the reels of material from the reel preparation station to the reel changer of the webprocessing machine.

The secondary reference to Schaede was cited to show the structure of a web-

processing machine and a direction of web travel. Initially, it is noted that the Schaede published application has issued as U.S. patent No. 7,040,231. The following discussion will be directed to the issued patent. It is to be noted that this patent has nothing to do with transport carriages or reel preparation stations. Instead, it is directed to a method for regulating a web elongation. The web is pulled from a roll changer 01 and run through a plurality of printing units 06, 07, 08, and 09. A tension in the web is monitored and is controlled to compensate for web elongation.

At best, this patent shows that a single web of material can be fed from a roll changer 01 through a plurality of aligned printing units 06, 07, 08, and 09. If it were to be combined with the Lehrieder reference, the result would still be an intermediate storage area located to the side of the press with the use of four different transport carriages to get each roll of material to the reel changer. In the Schaede reference, each web-processing machine has its own reel stand 2. In Schaede, one roll changer 01 supplies a single web that passes through a sequence of printing units 06, 07, 08, and 09. The substitution of the Schaede device for the press assembly of Lehrieder does not supply the teachings of the subject invention, which are missing from the Lehrieder reference. Thus, Lehrieder in view of Schaede does not render obvious the present invention as recited in currently amended independent claim 89.

All of the rest of the claims that are pending in the subject application depend from believed allowable, currently amended independent claim 89. All of these claims are also believed to be allowable. Various ones of the claims that were withdrawn from consideration, in response to the Restriction Requirement of May 27, 2009, have also

been amended to conform their language to that of currently amended, independent claim 89. Rejoinder of those previously withdrawn claims is respectfully requested.

## **SUMMARY:**

Independent claim 89 and various ones of the dependent claims have been amended a second time. It is believed that all of the claims now pending in the subject application are in condition for allowance. A Request for Continued Examination (RCE) is being filed concurrently to provide the Examiner with an opportunity to fully consider these currently amended claims. Allowance of the claims, and passage of the application to issue is respectfully requested.

Respectfully Submitted,

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